

DOCKET NO.: HHD-CV18-6088970-S : SUPERIOR COURT
GLORIA FARBER, EXECUTOR OF THE : J. D. OF HARTFORD
ESTATE OF HILLIARD FARBER
VS. : AT HARTFORD
FORE GROUP INC., ET AL ; SEPTEMBER 28, 2018

OBJECTIONS TO DEFENDANTS' REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to 13-10 of the CT Practice Book, the Plaintiff, Gloria Farber, Executor of the Estate of Hilliard Farber, hereby objects to the following Requests for Production of documents:

2. Copies of all State and Federal Tax Returns filed by the Plaintiff's Decedent, either individually or jointly with others, for tax years 2005 through the date of Plaintiffs Decedent's death.

OBJECTION: Plaintiff objects to the forgoing request on the basis the request seeks documents that are irrelevant, immaterial and not likely to lead to the discovery of admissible evidence. The requested time frame is evidence as to harassment of plaintiff. Further the request seeks documents that have no bearing whatsoever in regard to the claim before the Court and is a mere attempt to invade personal finances of both the decedent and the plaintiff. The individual defendant and sole owner of Fore Group is involved in a bitter divorce with the decedent's daughter.

3. Copies of any and all State and/or Federal Gift Tax Returns filed by Plaintiffs Decedent, individually or jointly with others, for tax years 2005 through the date of Plaintiffs Decedent's death.

OBJECTION AND RESPONSE: Plaintiff objects to the forgoing request on the basis the request seeks documents that are irrelevant, immaterial and not likely to lead to the discovery of admissible evidence. Further the request seeks documents that have no bearing whatsoever in regard to the claim before the Court and is a mere attempt to invade personal finances of both the decedent and the plaintiff. Notwithstanding, plaintiff will produce copies of any gift tax returns in favor of Fore Group or Dulos if they exist from 2009 through the present.

8. Copies of any and all State and/or Federal Estate Income Tax Returns filed on behalf of the Estate of Plaintiff's decedent.

OBJECTION: Plaintiff objects to the forgoing request on the basis the request seeks documents that are irrelevant, immaterial and not likely to lead to the discovery of admissible evidence. Further the request seeks documents that have no bearing whatsoever in regard to the claim before the Court and is a mere attempt to invade personal finances of both the decedent and the plaintiff. Notwithstanding said objections, to the extent the tax returns reflect monies due and owing from the defendant, plaintiff will produce.

9. For any Trusts of which Plaintiff's decedent was Grantor, including but not limited to the Jennifer Farber 2001 Trust between Hilliard Farber, Grantor and Hilliard Farber and John P. Schmitt, as Trustees, and The Farber Family 2012 Trust, between Hilliard Farber, Grantor and John P. Schmitt, Trustee, provide copies of any and all Trust income tax returns, Trust gift tax returns, copies of any crummy letters, any and all Trust accountings to beneficiaries as well as

copies of any and all Trust account statements from any financial institutions for the period of 2005 through to present.

OBJECTION: Plaintiff objects to the forgoing request on the basis the request seeks documents that are irrelevant, immaterial and not likely to lead to the discovery of admissible evidence. Further the request seeks documents that have no bearing whatsoever in regard to the claim before the Court and is a mere attempt to invade personal finances of both the decedent and the plaintiff. It seeks to implicate issues or potential issues in the divorce between decedent's daughter and individual defendant who solely owns the Fore Group.

PLAINTIFF

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CERTIFICATION

This is to certify that on this 1st day of October 2018, a copy of the foregoing was served upon all counsel of record via Electronic Delivery.

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